

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BONNIE WEBB, on behalf of plaintiff and a)	
class,)	
Plaintiff,)	
v.)	Case No. 11-cv-5111
)	
MIDLAND CREDIT MANAGEMENT,)	Judge Joan H. Lefkow
INC., et al. ,)	Magistrate Judge Martin C. Ashman
)	
Defendants.)	
)	

**DEFENDANTS' OPPOSITION TO MOTION FOR LEAVE TO FILE AMENDED
COMPLAINT**

Defendants MIDLAND CREDIT MANAGEMENT, INC. (MCM), MIDLAND FUNDING LLC (Midland LLC) and ENCORE CAPITAL GROUP, INC. (Encore) (collectively "defendants"), by their attorneys respectfully submit this Opposition to Plaintiff's Motion for Leave to File Amended Complaint. In support of this Opposition, defendants state as follows:

1. Defendants filed their motion to compel arbitration on October 17, 2011 and their amended motion to compel arbitration on November 10, 2011. This amended motion has been fully briefed.
2. Plaintiff Webb has taken two depositions of defendants' personnel.
3. Now, in order to avoid a possible order compelling arbitration, plaintiff has motioned the Court for leave to file an amended complaint in order to add another plaintiff, Fuller, at this late date.
4. Written discovery of Fuller will be necessary.
5. This Court should deny plaintiff's Motion for Leave to File Amended Complaint in order to add another plaintiff at this late date.

Dated: March 12, 2012

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Respectfully submitted,

MIDLAND CREDIT MANAGEMENT, INC.,
MIDLAND FUNDING, LLC, and ENCORE
CAPITAL GROUP, INC., Defendants

By: /s/Clifford E. Yuknis
One of Their Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2012, I electronically filed the above and foregoing **Notice and Defendants' Opposition to Plaintiff's Motion for Leave to File Amended Complaint** with the Clerk of the U.S. District Court, using the CM/ECF system reflecting service to be served on all parties of record.

HINSHAW & CULBERTSON LLP

s/ Clifford E. Yuknis

Clifford E. Yuknis